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COMPILER'S NOTE: In 1934 Bob Marshall, then chief forester of the Office of Indian Affairs, sent a memo to Interior Secretary Harold Ickes proposing a national policy to preserve wilderness areas.

Marshall or Ickes gave a copy to NPS director Arno Cammerer, who responded with his own memo to Ickes, in which he defended the NPS record, particularly against Marshall's attacks on mountaintop scenic parkways being planned for Great Smoky Mountains, Shenandoah and the Green Mountains. In this defense, Cammerer told the secretary that while accommodating visitors running into the millions "we have been able to conserve the vast bulk of the parks free from roads and buildings, and other artificialities. Wilderness areas are given definite status on our Master Plans for individual parks and monuments."

"19

Marshall repeatedly asked Secretary Ickes, as early as 1935, for his consent that Marshall be allowed to transfer to the Forest Service. In a memo documenting a meeting with Ickes, Marshall quoted the secretary as asking: "Why don't you fight this wilderness battle in my department?"

I replied: Eighty percent of the roadless areas of 100,000 acres or more are in the national forests. The Park Service has wrecked most of its roadless areas and the possibility of saving the wilderness just from a sheer statistical standpoint lies primarily in national forests."²⁰

In 1937 Marshall did move to the Forest Service. Responding to a letter from Ickes, he wrote:

Aside from your periodical and splendid stopping of road construction in National Parks, the Park Service seems to have forgotten the primitive. ... the requirements of trail building machinery and large crowds are more important in their minds than the preservation of the primitive. ...

Of course, I know if you ran the Park Service the things I complain about would not occur. But no cabinet officer can possibly check details, and it is the details which are wrecking the wilderness environment of those extraordinary scenic areas which were set aside for special protection under the name of National Parks."²¹

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COMPILER'S NOTE: In the 1930s the National Parks Association became increasingly alarmed at the dilution of the standards for national parks, both by development within the parks and by the New Deal expansion of the National Park System to include recreation areas. At its 1936 annual meeting, the trustees resolved that the Association would:

"segregate from all other national parks, and designate by the title National Primeval Parks System, those National Parks which, by reason of possessing primeval wilderness of conspicuous important and supreme scenic beauty, conform to the standards originally recognized under the title of National Parks" and urge that this become common usage by the agency, Congress and the American people.²²

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... the present tendency in both National Forests and National Parks towards so-called development of their recreational resources to encourage maximum use by crowds of people ... serious impair[s] or destroy[s] the very qualities of wilderness and solitude, intangible though they may be, which are being sought after by an increasing number of people each year.

The conviction is steadily growing that neither National Forests nor National Parks are a perfect answer to this demand [for wilderness]. Perhaps there should be a third federal land classification for administrative purposes in which the key note of administration would be to let it alone.

—KENNETH A. REID (1939)²³



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While national parks appeared to be changing standards in a passionate policy of play, national forests are developing, in their wilderness areas, a strictly limited system of natural museums made possible by the absolute exclusion of roads and all that roads imply.

-ROBERT STERLING YARD (1940)24

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National Parks ... often must justify their existence to the locality or state in which they are situated[,] principally on economic grounds. As long as the drums throb for tourist dollars, park administrators will find it hard to accommodate the increasing army of sightseers without extending development. It is highly improbable that a seemingly logical course of restricting visitation to any national park will be put into effect until every possible means of providing accommodation is exhausted. It is a fair question to ask how much of the parks will be developed by then. ...

... many administrators have excused pet development projects for wilderness lands on the theory that plenty of wilderness is being preserved elsewhere. There is a constant nibbling away of wilderness units, more slowly in the parks than in the forests.

-JAMES P. GILLIGAN (1954)25

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Whatever the prospect in other areas, conservationists have for many years assumed that within the national parks the preservation of wilderness is assured. ...

Charles Stevenson in his article for The Reader's Digest on "The Shocking Truth About Our National Parks," ... protests most strongly that less than half of the national park funds appropriated during this current fiscal year are "for the operation, maintenance, and protection of these parks as wilderness areas." He calls for the elimination of all purely resort activities and for "an alert and informed public opinion" that will "help the National Park Service get back to its traditional policy and functions." ...

Whether the answer is to seek more specific protection of wilderness with the parks, setting these aside from areas of "development," or simply a more earnest and vigilant adherence to the national park principles now threatened, it seems certain that those concerned with wilderness preservation as a national policy should be taking a good look at our national parks and the policies governing their protection and use. Even the wilderness of the National Park System cannot be taken for granted.

-HOWARD ZAHNISER (1955)26

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Generally speaking, in a National Park only those developments are justified which are required in order for visitors to use the park beneficially, and to enjoy and understand the natural scene. This means reasonable access by road and by trail to the area and to selected places within it that will give the visitor a good example of its major qualities.

—THE NATIONAL PARK WILDERNESS (1957)²⁷

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As much as those in the [National Park] Service have done and continue to attempt in protecting this heritage, even with the help of their friends outside, pressure continually whittles away what is left of its wild lands. ... they seem to be refuted by the new Stevens Canyon road in Mount Rainier National Park. This unnecessary road, started about 25 years ago, merely enables the motorist to make a shorter loop drive. It is impossible to visualize time healing the abused landscape short of thousands of years, and the gash, visible for miles outside the park, belies the presence of wilderness.

-PAULINE [POLLY] DYER (1957)28



IV. THE NATIONAL PARK SERVICE AND the Wilderness Act of 1964

-1-

COMPILER'S NOTE: In February 1956—the same month in which he began to draft the Wilderness Bill— Howard Zahniser, executive director of The Wilderness Society, together with David Brower, executive director of the Sierra Club, and Charles G. Woodbury, visited with NPS director Conrad Wirth in Washington, D.C. and provided him with a confidential copy of an early draft of what became the Wilderness Act. It was a hurried meeting after Wirth had attended a day-long session with the National Capitol Planning Commission and, as Brower noted, "We had only a few minutes to hurriedly sketch the proposal, and leave a preliminary draft of it."

Nonetheless, Wirth sent Zahniser a formal and detailed 3-page letter of comments. Noting that the draft bill would include within the proposed National Wilderness Preservation System "certain primeval areas located within national parks and monuments," Wirth wrote:

It is our belief that such primeval areas of national parks and monuments are, in fact, already wilderness areas with adequate protection against future nonconforming use. ... In these circumstances, it is our view that nothing would be gained from placing such areas in the National Wilderness Preservation System as provided in the bill. ...

Summed up, I feel that the national parks and some of the national monuments are the supreme wilderness regions of the Nation. Ever since the Yellowstone Act of 86 years ago provided for the retention of the wonders there, "* * * in their natural condition" the objective has been clear and definite. It was re-emphasized in the Act of 1916 establishing the Service. Therefore, I hope you will appreciate the fact that we view with some apprehension any proposed law which will deal with our fundamental objectives and policy. What we have now can hardly be improved upon.

—CONRAD L. WIRTH (1956)³⁰

[NOTE: The National Park Service opposed the Wilderness Bill from its introduction in 1956 until the arrival of President Kennedy, whose administration endorsed the legislation.]

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As a result of informal suggestions by National Park Service officials there has been added a sentence at the end of section 2 (b)³¹ insuring that the provisions of the wilderness bill will not lower National Park Service standards and reaffirming these standards as already established in basic legislation [the organic act].

—SEN. JAMES E. MURRAY (1958)³²

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I agree with the concept that areas set aside and developed for mass public use are zones of civilization in a wilderness setting, and that our park roads are corridors through the wilderness reaching or connecting these zones. I can see no other acceptable way that can be found to meet all the responsibilities placed upon the National Park Service by existing laws. As a matter of fact, this situation is specifically recognized in the current bill establishing a National Wilderness Preservation System. Under provisions relating to the National Parks, the developed and road areas will be described and then what is left will be wilderness. Under the standards established by the act, at least 98 percent of park lands will qualify as wilderness.

-STEWART L. UDALL (1961)34



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Under the standards which would be established for admission of areas to the National Wilderness Preservation System under current legislative proposals, 99 percent of national park lands would qualify.

-Conrad L. Wirth (1961)35

V. WILDERNESS "ZONING" IN THE NATIONAL PARKS

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... wilderness areas could, it seems to me, be fitted into the various National Parks. As far as I can see there would usually be necessary neither new costs nor new laws nor new work—simply a well-pondered administrative decision delimiting the areas, and in such area[s] establishing a permanent "closed season" on roads, cottages, or other developments inimical to the wilderness use.

—ALDO LEOPOLD (1925)³⁶

-2-

The thought has been expressed during the last year or two by a number of conservationists and wilderness-minded folk that perhaps the [National Park] Service will be unable to withstand the pressure for development until every corner of the parks has been invaded and the wilderness values submerged. Such persons have explained their opposition to the addition of the Kings Canyon, Mount Olympus and similar areas to the National Park System on the ground that they consider the regions in question to be safer from human interference under their present status. Perhaps it is in recognition of this point of view that the Forest Service has reserved from future development eighteen "primitive areas,"...

[The National Park Service] cannot hope to accommodate unlimited numbers of people and ... soon a line will have to be drawn against further development. ... [There is a need for] definite recognition of remnant wilderness areas and establishment of a code of administration designed to protect them from all but the very simplest maintenance activity.

—E. LOWELL SUMNER, JR. (1936)³⁷

-3-

If and when this great area [Olympic] is "saved" for the public, the dispute, which is already under way, will be between the wilderness advocates and the park administration. The latter, if it follows precedent, will open up this wilderness to the public by roads and install hotels and other accommodations. But pressure is strong to hold it, not as a typical developed national park, but as a true wilderness, dedicated to "youth," and accessible only by trail, on foot or pack horse, with over-night shelters of course, and other aids to pedestrians and caravans.

Meanwhile a terrific drive is on by the National Park Service, to capture and capitalize the sentiment back of the wilderness idea, and with this backing to secure as parks, the 11 million acres of wilderness or "primitive" areas already established within the National Forests ... One of the most pressing arguments used is the assumed precarious status of any area set aside for a wilderness solely by executive orders of the [Chief] Forester or Secretary of Agriculture. For this reason I felt that wilderness areas should be given legal status by acts of congress, but that one the other hand they should remain as integral portions of the National Forests and not be transferred and take park status, to be subjected to the pressure for development which is desecrating so many of our most prized National Parks like Yellowstone and Sequoia.

—H. H. CHAPMAN (1938)³⁸

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The growth of a protective attitude toward wilderness values in this country, particularly in the last decade, is an important asset to our national parks. It gives strong support to a restraining hand in the



planning and authorization of development programs, ...

Several years ago when we first developed the Master Plan, the subject that received the most attention was that of the wilderness area. We included a map in the Master Plans of several of the larger parks to outline which [lands] were to be designated as wilderness areas and set aside for that purpose. Our first difficulty was with the definition of wilderness areas. We found that some of our authorities would not approve an area as a wilderness area, because it contained a shelter cabin. We found practically no areas within national parks that would qualify under the Webster definition, as most of those proposed had at least one trail. In the long run, I feel that we shall have to give up the idea, as it was first proposed, and rather than approach the problem from the angle of setting aside wilderness areas within the national parks, we must approach it from the other direction—that is, we must restrict the limits of developed areas and apply the protection that would be given to these wilderness area to all of the area within the boundaries of the park that is not a developed area.

—THOMAS C. VINT (1938)³⁹

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The concept [of the Wilderness Act] has great promise for the days coming soon, when the zoning we have always understood to exist in the parks [sic] will need this careful spelling out to counteract pressures such as we hardly used to dream of.

—DAVID BROWER (1956)⁴⁰

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We should consider the parks as a whole as "wilderness" and tag the exceptions, rather than classifying special portions of the parks as "wilderness."

-EIVIND SCOYEN (1955)41

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What we all want to do [with the draft Wilderness Bill] is to start where we are and move toward where we want to go. We are convinced that it is possible to get there from here. Where we are is the Act of 1916, which in itself does not preserve wilderness. Old Faithful Inn, the Ahwanee, Going-to-the-Sun Highway, the proposed Yosemite warehouses, and the proposed Shrine of the Ages Chapel [over the South Rim of the Grand Canyon] are not wilderness. The 1916 act permits such development anywhere in the parks,... This is not to say the developments are wrong, but just that they are permitted. Glacier View Dam [proposed in Glacier National Park] or Smoky Range reservoir would not be wilderness. The present law permits them... The Park Service, backed by the Secretary, acted against Glacier View. We expect that there will be a similar position against Smoky Range, but still the Park Service could be constrained not to act[,] as it was in Dinosaur [where the NPS was muzzled by the secretary and president, who supported the Echo Park Dam.] So the Act of 1916 isn't all it could be, and that's where we are.

Where do we want to go? We think it is toward Congressional recognition, how non-existent, of our best wilderness, whoever administers it[,] and toward a greater opportunity for public support of it. ... The public does pretty well—witness Dinosaur, the Tetons, Olympic, Rainier and Hidden Valley ... and so on—when it has a chance. ... The public ... also stands ready support these values should the administrator fail, as could happen in the parks all too easily should one of your successors, for example, not be a career man.

—DAVID BROWER (1956)⁴²

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I understand that Connie Wirth read his letter to Zahnie [Howard Zahniser] before your Advisory Board in his effort to get the Board to recommend against the [wilderness] bill.

To me, a sentence of Connie's in a recent letter to Fred Packard [executive secretary of the National Parks Association] about the Shrine of the Ages is the key to the present, and I hope temporary, attitude of the National Park Service. Fred had wanted any shrine to be within the limits of the village, and Connie



replied that the limits had never been designated. They ought to be designated as well as they can be now, with study, and not just sooner or later by chance. The bill would spur the designation.

... park-facility development certainly needs a better limitation than now exists.

—DAVID BROWER (1956)⁴³

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... this program [the Wilderness Act] vested in Congress the power and opportunity to fix firm and lasting limits on the extent to which the remnant wilderness of our parks might be further developed.

-Rep. Patsy T. Mink (1970)44

VI. WILDERNESS BOUNDARIES IN THE NATIONAL PARKS

-1-

The best protection we can give the core of wilderness is to fully protect its critical fringes ... this fringe is, in fact, the part of the wilderness most exposed to visitor use and enjoyment.

The extension of boundaries to the edge of roads which we recommend will <u>not</u>, in any way, conflict with or impair existing visitor use patterns or convenience facilities and comforts. Nor will it impede Park Service management or administration. It will, on the other hand, strengthen the protection of natural features of which the park was established.

-Douglas W. Scott (1972)45

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... we see that the National Park Service is, ... as a matter of blanket policy, setting the boundaries of its proposed wilderness units back from the edge of roads, developed areas and the park boundaries by "buffer" or "threshold" zones of varying widths. There is no requirement for that in the Wilderness Act. No other agency draws wilderness boundaries in this way, which has the effect of excluding the critical edge of wilderness from full statutory protection. The Wilderness Act calls for the designation of wild lands which are of wilderness "character." This term "wilderness character" applies only to the immediate land involved itself, not to influences upon it from outside areas. This point was specified precisely in an early amendment to the wilderness bill, which at one time used the alternative term "Wilderness environment." On July 2, [1960], the then chairman of the Interior Committee introduced S. 3809 ..., [a] "clean bill" version of the wilderness bill. One of the amendments embodied there was the change from the term "wilderness environment" in the act's definition to the term "wilderness character." Senator Murray explained this amendment, and I quote: "The word 'character' is substituted because 'environment' might be taken to mean the surroundings of wilderness rather than the wilderness entity." (Congressional Record for July 2, 1960.) What this amendment made clear is that the suitability of each acre of possible wilderness is to be ascertained on the basis of that wilderness entity, not on the basis of insubstantial outside influences. Sights and sounds from outside the boundary do not invalidate a wilderness designation or make threshold exclusions necessary, as a matter of law.

On the same point, I note that, for example, wide swaths of land are excluded from wilderness adjacent to the Generals Highway in Sequoia National Park. Yet, I find no plans for any new development in that area in the recently-approved park master plan. So I fail to see the reason for excluding these wild lands, the critical fringes of the wilderness, while there would seem to be good reason for putting them within the full protective boundary of the designated wilderness.

In the absence of good and substantial reasons to the contrary—and I am [sic] specific, case-by-case reasons—the boundaries of wilderness areas within national parks should embrace all wild land. There is no



lawful policy basis for massive exclusions of qualified lands on which no development is planned. I can appreciate the interest of any agency in not surrendering their full administrative discretion over such areas, to build and develop or not to build and develop, but that is what the Wilderness Act mandates the National Park Service to do. This is not out of any suspicion or concern for Park Service stewardship, but because we in the Congress recognized the pressures that would face the national parks, and provided in the Wilderness Act the statutory basis for strengthening the protective hand of the National Park Service.

-Sen. Frank Church (1972)46

An earlier version of this compilation was prepared for a conference on national park wilderness in the National Park Service's Intermountain Region, held in Estes Park, Colorado on May 1-2, 2001. Doug Scott may be reached at Pew Wilderness Center, 705 Second Avenue, Suite 203, Seattle, WA 98104; (206) 342-9212; doug@pewwildernesscenter.org.

Horace M. Albright and Marian Albright Schenck, Creating the National Park Service: The Missing Years, (Norman: University of Oklahoma Press, 1999): 126-127.

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- National Park Service, The National Park Wilderness: 13 (Washington, D.C., September 1957) Emphasis in original.
- ³ 39 Stat. 535; 16 U.S.C. 1 (August 25, 1916).
- Albright and Schenck, Creating the National Park Service.
- Albright, "The Everlasting Wilderness": 63.
- James P. Gilligan, "The Contradiction of Wilderness Preservation in a Democracy," Proceedings, 1954 convention, Society of American Foresters, October 26, 1954, unpaginated 4-page reprint, copies in The Wilderness Society files and author's files. This paper was reprinted, with an accompanying editorial, in The Living Wilderness (spring-summer 1955).
- Sen. Hubert H. Humphrey, Congressional Record, February 11, 1957.
- Rep. John P. Saylor, "Saving America's Wilderness," Congressional Record, July 12, 1956. Saylor was the lead sponsor of the Wilderness Bill in the House.
- Howard Zahniser to Hon. James E. Murray, Chairman, Committee on Interior and Insular Affairs, U.S. Senate, 22 July 1957: 6; copy in The Wilderness Society files and author's files. Murray was the lead sponsor of the Wilderness Bill in the Senate in 1956.
- 12 Conrad L. Wirth, preface, The National Park Wilderness: 9.
- The National Park Wilderness: 14. Emphasis in original.
- Sellars cites Daniels' comments from National Park Conference, 3rd, Berkeley, Calif., 11-13 March 1915, Proceedings (Washington, D.C.: Government Printing Office, 1915): 19-20.
- ¹⁵ Richard West Sellars, Preserving Nature in the National Parks: A History (New Haven: Yale University Press, 1997); 21.
- Aldo Leopold, "The Wilderness and its Place in Forest Recreational Policy," Journal of Forestry 19, no. 7 (November 1921): 720.
- Dr. Charles C. Adams, "Ecological Conditions in National Forests and in National Parks," The Scientific Monthly 20, no. 6 (June 1925): 562.
- Report, "Suggested Program for Preservation of Wilderness Areas," Robert Marshall to Harold Ickes, April 1934, p. 8, National Archives, Record Group 79, File 601-12, Parks-General-Lands-General-Wilderness Areas, Pt. 1.
- Arno B. Cammerer, "Memorandum for the Secretary," May 16, 1934. I obtained the copies of this and the ensuing memos from Marshall and Cammerer that I have in my files from the files of The Wilderness Society, prior to those files being sent to the Denver Library. Copies of these and other documents had been supplied, presumably in confidence, by Marshall to his close colleague Robert Sterling Yard, executive secretary of the Society, as evidenced by notations in Marshall's handwriting..
- Robert Marshall, "Interview with Secretary Ickes," December 7, 1935. Same source as note 17. On the top margin of this copy, Marshall wrote to Yard: "Dear Bob: This is for your very private files. It may interest you. Bob."
 Marshall to Ickes, May 21, 1937. Same source as note 18.

¹⁷ Stat. 32; 16 U.S.C. 22 (March 1, 1872).



- Resolution quoted in William P. Wharton, "The National Primeval National Parks," National Parks Bulletin 13, no. 62 (February 1937): 3.
- ²³ Kenneth A. Reid, "Let Them Alone!" Outdoor America 5, no. 1 (November 1939): 7. Reid was the editor and general manager of the Izaak Walton League of America.
- Robert Sterling Yard, "Saving the Wilderness," The Living Wilderness 5, whole no. 5 (July 1940): 2.
- 25 Gilligan, "The Contradiction of Wilderness Preservation."
- Howard Zahniser, editorial "Our National Parks," The Living Wilderness 19, no. 51 (winter 1954-55): 2.
- 27 The National Park Wilderness; 21.
- Pauline Dyer, "Wilderness and the National Parks" (a review of The National Park Wilderness), The Living Wilderness. [My copy is undated, but I believe this comes from an issue in 1958].
- David R. Brower to Conrad L. Wirth, May 16, 1856: 1; copy in The Wilderness Society files and author's files.
- Onrad L. Wirth to Howard Zahniser, March 19, 1956; copy in The Wilderness Society files and author's files.
- This wording became a part of section 4(a)(c) of the Wilderness Act as enacted.
- "Changes in the Revised Wilderness Bill, S. 4028, From the Original Bill, S. 1176," included in remarks of Sen. James E. Murray, Congressional Record 104 (June 18, 1958): 11558.
- This was true of the version of the Wilderness Bill being referred to by Secretary Udall, and as passed by the Senate the following September. However, the law as enacted reversed the procedure, with the wilderness area being described and what was left out being left in regular park status subject to the provisions of the organic act and other relevant laws that allowed development.
- "Preservation and Use of Areas Administered by the National Park Service," Memorandum to Director, National Park Service from Secretary of the Interior Stewart L. Udall, March 20, 1961. Copy, from NPS Directors Staff Meeting minutes, March 23, 1961, in author's files.
- "Recent Magazine Articles on National Parks," Memorandum to Secretary of the Interior from Director, National Park Service, March 10, 1961. Copy, from NPS Directors Staff Meeting minutes, March 23, 1961, in author's files.
 Aldo Leopold, "The Last Stand of the Wilderness," American Forests and Forest Life 31 (1925): 604.
- E. Lowell Sumner, Jr., "The Wilderness Problem in the National Parks," excerpt from a Special Report on a Wildlife Study of the High Sierra in Sequoia and Yosemite National Parks and Adjacent Territory, October 9, 1936; National Archives, Record Group 79 (NPS) Parks-General-Lands-General-Wilderness Areas, Part 1. Sumner was a regional wildlife technician for the NPS.
- H. H. Chapman, "National Parks, National Forests and Wilderness Areas," Journal of Forestry 36, no. 5 (May 1938): 473-474. Chapman was president of the Society of American Foresters and a Forest Service partisan in the NPS-USFS competition of that era.
- Thomas C. Vint, "Development of National Parks for Conservation," American Planning and Civic Annual, edited by Harlean James (Washington, D.C.: American Planning and Civic Association, 1938): 69, 71. Vint was chief of planning for the National Park Service.
- 40 David R. Brower to Horace M. Albright, April 30, 1956; copy in The Wilderness Society files and author's files.
- Eivind Scoyen, in "View of the Wilderness Administrator: Park Wilderness," summary of a panel discussion at the Sierra Club's 4th Biennial Wilderness Conference, in David Brower, editor, Wildlands in our Civilization (San Francisco: Sierra Club, 1964): 158. At this time, Scoyen was Superintendent, Sequoia and Kings Canyon National Parks
- ⁴² David R. Brower to Conrad L. Wirth, May 16, 1956; copy in The Wilderness Society files and author's files.
- ⁴³ David R. Brower to John B. Oakes, May 16, 1956; copy in The Wilderness Society files and author's files. Oakes was the editor of the editorial page of *The New York Times*, and a member of the Secretary's Advisory Board on National Parks.
- ⁴⁴ Rep. Patsy T. Mink, "National Park Wilderness Studies 5 Years Behind Schedule," Congressional Record, July 27, 1970: H7214 [daily edition].
- Douglas W. Scott, testimony for The Wilderness Society, in Designation of Wilderness Areas, Part III, Lassen Volcanic National Park as Wilderness Area, Hearing before the House Subcommittee on National Parks and Recreation, Committee on Interior and Insular Affairs (92d Congress; 2d session) on H.R. 10655, April 27, 1972: 41.
- Sen. Frank Church, statement in Preservation of Wilderness Areas, Hearing before the Senate Subcommittee on Public Lands, Committee on Interior and Insular Affairs (92d Congress; 2d session) on S. 2453 and Related Wilderness Bills, May 5, 1972: 59-60. Church, the chair of the subcommittee, had been the floor manager when the Senate passed the Wilderness Act in 1961 and again in 1963.